

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
v.) CRIMINAL NO. 19-mj-2210-MBB-11
)
KIMBERLY LOPEZ,)
Defendant.)
)

**DEFENDANT'S STIPULATION TO VOLUNTARY DETENTION PENDING OUTCOME
OF PROBATION INVESTIGATION**

Now comes Kimberly Lopes, and hereby stipulates to voluntary detention, pending the outcome of the supplemental investigation of the United States Probation and Pretrial Services Office (probation).

As reasons therefore, Ms. Lopes states the following:

- 1) A detention hearing was held on May 30, June 5, and June 10, 2019;
- 2) Ms. Lopes proposed that she be allowed to return to her home at 800 Bearse's Way, Apartment 1NC, Hyannis, MA consistent with the recommendations of probation;
- 3) The Court took the matter "under advisement;"
- 4) The Court requested that probation inspect and evaluate the home for safety purposes;
- 5) Defense counsel and probation have communicated multiple times, trying to ensure that the home is inspected and evaluated in a timely manner¹;

¹ Prior to her arrest, Ms. Lopes had full custody of the minor children. Her daughter, Tiana, has temporary custody. Probate and Family Ct. - BA19PO863GD

6) As of the morning of June 28, 2019, probation has not completed the investigation.

Respectfully submitted,
KIMBERLY LOPEZ,
By her attorney,

Date: June 28, 2019

/s/Henry Fasoldt
C. Henry Fasoldt (BBO# 667422)
185 Devonshire Street
Suite 302
Boston, MA 02110
henry@bostondefenselaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document was served by electronic delivery on AUSAs Chris Pohl and Lauren Graber on June 28, 2019.

/s/ Henry Fasoldt
Henry Fasoldt